

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
YONGPING WANG :
Debtor : BANKRUPTCY NO.: 19-16681-AMC

**RESPONSE TO MOTION FOR RELIEF FILED BY 2601 PARKWAY CONDOMINIUM
ASSOCIATION**

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Denied. Movant states a conclusion of law to which no response is required. .
3. Admitted.
4. It is admitted that the Debtor is a member of 2601 Parkway Condominium Association. To the extent Movant states a conclusion of law, no response is required.
5. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
6. Denied. Movant states a conclusion of law to which no response is required.
7. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
8. Denied. The Debtor is without requisite knowledge of attest the veracity of Movant's averment.
9. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
10. Movant states a conclusion of law to which no response is required.

11. Denied. By way of further response, the Debtor intends to cure any arrears due at this time.

12. Movant states a conclusion of law to which no response is required.

13. Admitted.

14. Admitted.

15. Admitted.

16. Denied. By way of further response, the Debtor intends to cure any arrears due at this time.

17. Admitted.

18. Admitted.

19. Admitted.

20. Denied. By way of further response, the Debtor intends to cure any arrears due at this time.

21. Denied. The Debtor is without requisite knowledge of attest the veracity of Movant's averment.

22. Admitted.

23. Denied. Movant states a conclusion of law to which no response is required.

24. The corresponding paragraph does not call for a response.

25. Denied. Movant states a conclusion of law to which no response is required.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: February 5, 2025

/s/ Brandon J. Perloff
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